## UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF OHIO

In re:

**Chapter 11** 

CARDINAL FASTENER & SPECIALTY

Case No. 11-15719

CO., INC.,

**Judge Randolph Baxter** 

Debtor.

## NOTICE OF APPEARANCE AND REQUEST FOR SERVICE ON BEHALF OF WELLS FARGO BANK NATIONAL ASSOCIATION

PLEASE TAKE NOTICE that pursuant to 11 U.S.C. § 1109(b) and Rules 2002, 9007, 9010(b) and 9013 of the Federal Rules of Bankruptcy Procedure, the undersigned attorneys and law firm enter their appearance as counsel for Wells Fargo Bank National Association ("Wells Fargo") and request that all notices given or required to be given in this case and all papers served in this case be given to and served upon the undersigned at the following office, telephone number, facsimile number and email address:

Nicholas J. Brannick, Esq. SQUIRE, SANDERS & DEMPSEY (US) LLP 41 South High St., Suite 2000 Columbus, OH 43215

Phone: 614.365.2700 Fax: 614.365.2499

Email: nicholas.brannick@ssd.com

**PLEASE TAKE FURTHER NOTICE** that the foregoing request includes not only notices and papers referred to in Federal Rules of Bankruptcy Procedure 2002(a), (b) and (f) and 3017(a), but also includes, without limitation, all orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or

oral, and whether transmitted or conveyed by mail, hand delivery, telephone, facsimile, email or

otherwise that relate to the Debtor, property of the Debtor or the Debtor's estate, or this case.

PLEASE TAKE FURTHER NOTICE that neither the filing of this Notice and Request

nor anything contained herein is intended to waive or shall constitute a waiver of any rights of

Wells Fargo, all of which are reserved, including but not limited to (a) the right of Wells Fargo to

have final orders in non-core matters entered only after de novo review by a District Court; (b)

the right of Wells Fargo to trial by jury in any proceeding so triable in this case or any case,

controversy or proceeding related to this case; (c) the right to have the District Court withdraw

the reference in any matter subject to mandatory or discretionary withdrawal; (d) the right to

have documents served in accordance with Federal Rule of Bankruptcy Procedure 7004 and

Federal Rule of Civil Procedure 4; or (e) any other rights, claims, actions, defenses, setoffs or

recoupments to which Wells Fargo may be entitled under agreements, in law or in equity. All of

the above rights, claims, actions, defenses, setoffs and recoupments are expressly reserved and

preserved unto Wells Fargo without exception, and with no purpose of confessing or conceding

jurisdiction in any way by this filing or by any other participation of Wells Fargo or its counsel

in this case.

Dated: June 30, 2011

Respectfully submitted,

<u>/s/ Nicholas J. Brannick</u>

Nicholas J. Brannick (0079642)

SQUIRE, SANDERS & DEMPSEY L.L.P.

41 South High St., Ste 2000

Columbus, OH 43215

Phone: 614.365.2700

Fax: 614.365.2499

Email: nicholas.brannick@ssd.com

Pro Hac Vice Motion Pending

Counsel for Wells Fargo Bank National Association

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